

From: [Chris Nevers](#)
To: andreas.roessler@daimler.com
Subject: Re: Antwort: Re: Fw: WG: Fw: Bluetec questions
Date: 05/07/2010 10:40 AM

Andreas,

Thanks, the carryover got me a little confused.

Chris

▼ [andreas.roessler---05/07/2010 09:32:04 AM---Chris the E 350 Bluetec was not certified in MY 2010 therefore it is a new](#)

From: andreas.roessler@daimler.com
To: Chris Nevers/AA/USEPA/US@EPA
Date: 05/07/2010 09:32 AM
Subject: Antwort: Re: Fw: WG: Fw: Bluetec questions

Chris

the E 350 Bluetec was not certified in MY 2010 therefore it is a new testgroup so we have to request a TWR.

I hope this helps to clarify the open questions

Andreas

With best regards

Andreas Rössler Dr.-Ing. Dipl. Wirtsch.-Ing.
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Nevers.Chris@epam

ail.epa.gov

An

05/07/2010 08:59
andreas.roessler@daimler.com
AM

Kopie

Thema

Re: Fw: WG: Fw: Bluetec

questions

Andreas,
What led to the test waiver request for the E350 Bluetec? Is it just a new worst case test configuration (increase in mass or road load)? Technically, if this was a carryover, there would be no need for a test waiver request. The major concern is any dosing, SCR strategy, or exhaust system changes. I can finalize the TWR decisions on the E350 in question after I hear back from you.

On another note, I can send you a separate email, but EPA is going to approve diesel fuel fired heaters following ARB policy. That policy, as I understand it, is to add FFH emissions to tailpipe exhaust numbers for FFH that are not disabled above 40F. I will need some clarification on just how ARB proposes FFH emissions will be measured and summed with tailpipe.

Also, we have a web ex conference room set up for the CBI / Ex. 4 meeting on 18th. I expect a half dozen or so people from EPA. I just wanted to be clear, will anyone be joining us, or will this be Web Ex for everyone from Mercedes?

Regards,
Chris

From:
andreas.roessler@daimler.com

To: Chris
Nevers/AA/USEPA/US@EPA

Date: 05/07/2010 04:05
AM

Subject: Fw: WG: Fw: Bluetec
questions

Chris

please find our answers below

I am currently in PII / Ex. 6 and I can tell you its very cold here
have a good start in the day

Andreas

With best regards

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1.
I wanted to ask you about the changes from the carryover 2010 package. We neither have any changes in the SCR system regarding hardware nor any changes with impact on limited emissions. So the current vehicles will be certified by carry over from MY10 to MY11.

2.
We would also like to see any update to SCR field information you may have, such as:
- any indication of inducement rate - we do not have any indication of inducement rates due to the fact that the amount of AdBlue in our vehicles is calculated to reach for a service intervall. Therefore our customers will not run out of DEF.
- component failure - please refer to latest EPA report (attached please find the relevant Bluetec matters)

- or tampering issues - no indication; whenever our customers come to service, the DEF will be replaced and refilled. As the refillment is not optional but takes place mandatory, tampering provides no benefit.

3.
Also, has CARB spoken to Mercedes about further SCR requirements starting in mid 2011 MY?
We had a tampering workshop on April 27th, 2010, with ARB. Our conclusion is that this was a very good meeting and Mercedes met ARB's expectations. We do not know about further ARB requirements for LD regarding SCR.

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